

## **REMARKS**

The Office Action mailed May 25, 2007 considered claims 2-4, 7-9, 12, 14-16, 18-21, and 29-39. Claims 2-4, 7-9, 12, 14-16, 18-21, and 29-39 were rejected under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Claims 2-4, 7-9, 12, 14-16, 18-21, 29-31, 33, 34, and 36-39 were rejected under 35 U.S.C. 102(a) as being anticipated by Cameron et al. (US 2003/0004964) hereinafter *Cameron*. Claim 32 was rejected under 35 U.S.C. 103(a) as being unpatentable over *Cameron* in view of Traversat et al. (US 6,366,954) hereinafter *Traversat*. Claim 35 was rejected under 35 U.S.C. 103(a) as being unpatentable over *Cameron* in view of <http://en.wikipedia.org/w/index.php?title=XPath&oldid=1315639> hereinafter *XPath*.<sup>1</sup>

By this paper, claims 31, 37, 38, and 39 have been amended<sup>2</sup>, and claim 35 has been cancelled such that claims 2-4, 7-9, 14-16, 18-21, and 29-34 and 36-39 remain pending in the application.

As a preliminary matter, Applicants would like to thank the Examiner for the courtesies extended during the telephonic interview held July 11, 2007. Details of that interview are included herein below.

### **Rejections Under 35 U.S.C. §112**

The Office action states that the claims "recite 'objects arranged in hierarchy...wherein defined relationships comprise relationships other than parent-child relationships'" and that "it is unclear how objects can be in a hierarchy and be related to each other not using parent-child relationships...."

The claims recite "objects each comprise corresponding attributes" and "relationships linking different attributes of different objects" and that "the defined relationships comprise relationships other than parent-child relationships defined by a directory hierarchy...." An example where relationships are not related by parent child relationships is illustrated in the Applicant's specification at page 13 paragraphs [0023] and [0024]. This example illustrates

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<sup>1</sup> Although the prior art status of the cited art is not being challenged at this time, Applicant reserves the right to challenge the prior art status of the cited art at any appropriate time, should it arise. Accordingly, any arguments and amendments made herein should not be construed as acquiescing to any prior art status of the cited art.

<sup>2</sup> Support for the amendments can be found throughout the specification, but with specificity at least at paragraph [0017].

where a view name "OrgChart" defines an attribute relationship where the attribute of one object is the Manager attribute and the different attribute of a different object is a DirectReports attribute. At paragraph [0021] it is illustrated different objects have different attributes, e.g. either a Manager or a DirectReports Attribute. However, the "OrgChart" relationship does not define a parent-child relationship, but rather defines a relationship between different attributes of different objects where the attributes may be in the same hierarchy, but are not related in the hierarchy by parent-child relationships. Thus, applicants respectfully submit that the rejection under 35 U.S.C. §112 should be withdrawn.

### **Rejections Under 35 U.S.C. §102**

The claims of the application are generally directed to linking different objects in a database by defining relationships between different attributes of the different objects. A given defined relationship can be identified by an assigned view name. For example, the Applicant's specification at page 13 paragraphs [0023] and [0024] illustrates an example where a view name "OrgChart" defines an attribute relationship where the attribute of one object is the Manager attribute and the different attribute of a different object is a DirectReports attribute. The assigned view name is then used by a client to request an object in the database. The relationships implicit in the assigned view name can be used to traverse a path to a particular object in the database. For example, Applicant's specification at page 18, paragraph [0030], illustrates an example with a client request, "OrgChart/John/Jane/Alice."

Each of the claims as now amended recites that requests are entered in the format of a location path expression as an abbreviated XPath expression, and that a server locates a requested object by converting the abbreviated XPath expression to one or more database queries to locate the requested object in the database. At least these two elements are not shown in the art cited by the Office action.

The Office Action cites to Cameron for showing a request in the format of a location path expression. However, Cameron does not illustrate expressions including an XPath expression. Rather, Cameron appears to show element queries specified by specifying the element and the value in standard programming language comparison expressions. For example, Figure 7 of Cameron illustrates that queries are performed by specifying a search for "EQUAL ELEMENT ='SN' VALUE=DOE". However, Cameron does not appear to specify an abbreviated Xpath expression, such as for example /OrgChart/John/Jane/Alice.

The Office Actions cites to *XPath* for showing XPath expressions. However, *XPath* does not show converting XPath expressions to one or more database queries to locate the requested object in the database. Rather, *XPath* merely shows the XPath syntax with a number of examples.

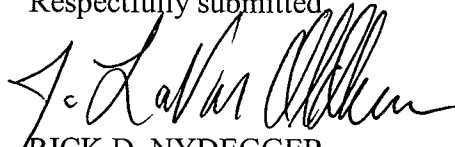
Further, the Office Action cites to *Traversat* at col. 5, lines 38-42 for showing "...and wherein the location path expression is translated into a plurality of LDAP queries that are processed by the Web service to stratify the client request and that are iteratively processed until the client request is satisfied." However, the cited portions of *Traversat* merely state "[m]ethods and systems for mapping an attribute or entry in an LDAP directory service to a configuration server schema is described in the various figures. In the described embodiment, the configuration server contains a software components referred to as a Java System Database...." However, *Traversat* does not show converting an XPath expression to one or more database queries as is now recited by the claims of the present application.

In view of the foregoing, Applicant respectfully submits that the other rejections to the claims are now moot and do not, therefore, need to be addressed individually at this time. It will be appreciated, however, that this should not be construed as Applicant acquiescing to any of the purported teachings or assertions made in the last action regarding the cited art or the pending application, including any official notice. Instead, Applicant reserves the right to challenge any of the purported teachings or assertions made in the last action at any appropriate time in the future, should the need arise. Furthermore, to the extent that the Examiner has relied on any Official Notice, explicitly or implicitly, Applicant specifically requests that the Examiner provide references supporting the teachings officially noticed, as well as the required motivation or suggestion to combine the relied upon notice with the other art of record.

In the event that the Examiner finds remaining impediment to a prompt allowance of this application that may be clarified through a telephone interview, the Examiner is requested to contact the undersigned attorney at 801-533-9800.

Dated this 25<sup>th</sup> day of July, 2007.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Rick D. Nydegger", written over the typed name.

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